

Texas Workforce Commission

A Member of Texas Workforce Solutions

Joe Esparza, Chairman
Commissioner Representing
Employers

Alberto Treviño, III
Commissioner Representing
Labor

Brent Connett
Commissioner Representing
the Public

Steve Pier
Executive Director

March 27, 2026

VIA E-Mail: 455.Submission@traviscountytexas.gov
districtclerkhelp@traviscountytexas.gov

The Honorable Laurie Eiserloh
445th District Court
The Honorable Velva L. Price
Travis County District Clerk
Civil Family Court Facility
1700 Guadalupe Street
Austin, Texas 78701

Re: Cause No. D-1-GN-26-000711; Community Capital Partners, LP, et al. v. Texas Workforce Commission, et al.; In the 201st Judicial District Court, Travis County, Texas

The Honorable Laurie Eiserloh:

As General Counsel of the Texas Workforce Commission, I write on behalf of the Texas Workforce Commission, Randy Townsend, in his official capacity as Executive Director of the Texas Workforce Commission, and Bryan Snoddy, in his official capacity only as Director of the Texas Workforce Commission Civil Rights Division (“Defendants”), to clarify for the record Defendants’ position regarding the purported pleading titled “Defendants’ First Amended Answer and, in the Alternative, Counterclaim” that was tendered for filing by counsel at the Office of the Attorney General (“OAG”) on March 10, 2026.

Defendants were not consulted prior to the pleading being tendered for filing, nor did Defendants review or approve it. The decision to include a counterclaim was made by counsel alone without the knowledge, direction, or approval of Defendants. It therefore was not subjected to the standard notice, review, and approval process before TWC seeks affirmative relief. As the clients in this matter, Defendants are entitled to direct the overall legal objectives and methods of this representation, and they neither agreed to nor authorized pursuing this counterclaim.

Defendants have since been made aware that the pleading was rejected by the Travis County District Clerk’s Office. Consequently, the amended answer and counterclaim is not a live pleading before this Court. While the counterclaim was submitted without authorization, Defendants continue to stand by the jurisdictional arguments presented in their Plea to the Jurisdiction filed on February 18, 2026, and maintain that the Court should dismiss this action based on those arguments.

Respectfully submitted,



Les Trobman
General Counsel, Texas Workforce Commission

cc: All Counsel of Record via E-service